

1 ROBERT E. BORTON (State Bar No. 53191)
2 RACHEL M. JONES (State Bar No. 218642)
3 HELLER EHRLMAN LLP
4 333 Bush Street
5 San Francisco, CA 94104-2878
6 Telephone: (415) 772-6000
7 Facsimile: (415) 772-6268
8 E-mail: robert.borton@hellerehrman.com
9 rachel.jones@hellerehrman.com
10 Attorneys for Plaintiff
11 RAYSHAUN DEVON SINCLAIR

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RAYSHAUN DEVON SINCLAIR,

Case No. C 03-4331 WHA (PR)

Plaintiff,

v.

C/O T.W. BUSH,

Defendant.

**STIPULATION AND [PROPOSED]
ORDER FOR THE DEPOSITION OF
WITNESSES CONFINED IN PRISON**

Trial Date: December 5, 2005
Time: 7:30 a.m.
Place: Courtroom 9, 19th Floor
Judge: The Honorable William Alsup

Pursuant to Rule 30(a)(2) of the Rules of Civil Procedure and Northern District of California Local Rule 7-12, plaintiff Rayshaun Sinclair and Defendant T.W. Bush, by and through their respective counsel, stipulate as follows:

WHEREAS, the individuals listed below were incarcerated at Soledad Correctional Training Facility on January 17, 2003 and may have witnessed the events giving rise to this action;

WHEREAS, they are still confined in prison by the California Department of Corrections, whether at Soledad or another facility;

1 WHEREFORE, The parties stipulate that plaintiff Rayshaun Devon Sinclair, by his
 2 attorney, may take depositions upon oral examination of the following witnesses confined
 3 in prison by the California Department of Corrections:

4	Name	Inmate #	Location
5	Rasheen Arterberry	T-38838	Soledad Correctional Facility
6	Ramone Harvey	T-40546	Avenal State Prison
7	James Kelly	J-56042	Mule Creek State Prison
8	Mr. Soaries	T-31739	Soledad Correctional Facility
9	Mr. Rodriguez	T-50934	Salinas Valley State Prison
10	Mr. Chan	T-37491	Soledad Correctional Facility
11	Darwin Shelton	E-36721	Soledad Correctional Facility
12	Spencer Grayer	T-43462	Soledad Correctional Facility

13 The parties further stipulate that the Court may enter its Order authorizing and
 14 directing the completion of such depositions at such times and in such manner as the parties
 15 shall determine by agreement between them.

16 DATED: June 21, 2005

Respectfully submitted,

HELLER EHRLMAN LLP

18 By


ROBERT E. BORTON
RACHEL M. JONES

21 Attorneys for Plaintiff
RAYSHAUN DEVON SINCLAIR

22 OFFICE OF THE ATTORNEY GENERAL

25 By


JENNIFER PERKELL

26 Attorneys for Defendant
T.W. BUSH

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Attorneys for Plaintiff
RAYSHAUN DEVON SINCLAIR

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OFFICE OF THE ATTORNEY GENERAL

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JENNIFER PERKELL

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Attorneys for Defendant
T.W. BUSH

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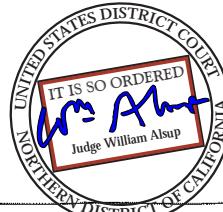
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3 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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6 DATED: June 23, 2005
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The Honorable William Alsup
United States District Judge